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**VIA ECF**

Hon. Valerie Figueredo  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

November 21, 2022

**Re: *Baliga v. Link Motion Inc. et al.*, 1:18-cv-11642 (S.D.N.Y.)**

Dear Judge Figueredo,

We write on behalf of the Court-appointed temporary receiver for Link Motion Inc., Robert W. Seiden, (the “Receiver”) in accordance with the Amended Order Referring the Case to Magistrate Judge Figueredo (Dkt. No. 362) to request approval to file certain documents under seal for the Court’s eyes only, pursuant to Federal Rules of Civil Procedure 5.2 and Your Honor’s Individual Practices at § I(g).

On November 18, 2022, we filed a Declaration from the Receiver (Dkt. No. 376) and a memorandum of law in support of the Receiver’s request for approval of the Receiver’s accounting (Dkt. No. 375). The Declaration annexed redacted copies of attorney invoices related to the work of the Receivership (the “Invoices”). We now write to respectfully request that this Court order the unredacted Invoices be kept under seal.

The Invoices contain attorney work product and detailed information protected under the attorney-client privilege. *See Varbero v. Belesis*, No. 20-cv-2538 (LJL), 2020 WL 7043503, at \*2 (S.D.N.Y. Dec. 1, 2020) (“[C]orrespondence, bills, ledgers, statements, and time records which also reveal the motive of the client in seeking representation, litigation strategy, or the specific nature of the services provided, such as researching particular areas of law, fall within the privilege.”) (citation omitted).

We thank the Court for its consideration of this request.

Respectfully submitted,

/s / Amiad Kushner

Amiad Kushner